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September 28, 2015

Via ECF

The Honorable Joan M. Azrack United States District Court Eastern District of New York 110 Federal Plaza Central Islip, New York 11722

RE: Rojas v. Law Offices of Clarfield, Okon, Salomone, & Pincus, P.L. et al. Civil Action No.: 2:15-cv-03268 (JMA)(SIL)

Dear Judge Azrack:

We represent defendant Law Offices of Clarfield, Okon, Salomone, & Pincus, P.L. ("COSP") in the above-referenced matter, and write on behalf of all the parties and pursuant to Section III(B) of Your Honor's Individual Rules to request an adjournment of the pre-motion conference currently scheduled for September 30, 2015 at 5:15 pm.

The parties continue to make progress towards settlement, including working on the exchange of necessary financial information and the preparation of settlement documentation, and are hopeful that they will have agreed upon settlement terms within the near future. The parties again request that they be permitted to report back to the Court within two (2) weeks regarding the status of settlement, and if the parties have determined that they are not moving forward with settlement, they will provide proposed alternative pre-motion conference dates at that time. All parties have consented to the adjournment. This is the third request for an adjournment of this conference has been made, and the adjournment will not affect any other scheduled deadlines or court appearances.

Thank you for your time and consideration of this matter.

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Respectfully submitted,

/s/ Thomas M. Mealiffe

Thomas M. Mealiffe

TMM/bjw